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December 19, 2005

Luly Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. 3692 - Verizon RI Proposed Alternative Form of Regulation Plan

Dear Ms. Massaro:

Enclosed for filing are the original and three copies of Verizon Rhode Island's Responses to the George Wiley Center's Data Requests 1-1 through 1-7.

Please be advised that certain responses contain proprietary and confidential business and financial information. They are therefore filed in the sealed envelope labeled "Contains Privileged Information – Do Not Release". Please place these documents in a secure, non-public file. These documents are being provided only to the Commission, and to the Division and the Attorney General in accordance with the terms of Protective Agreements between Verizon RI and those parties. Verizon RI will also provide these documents to the George Wiley Center upon execution of a Protective Agreement.

As always, please call me with any questions. Thank you for your attention to this matter.

Sincerely,

/s/ Alexander W. Moore

Alexander W. Moore

Enclosures

cc: Service List

**Verizon New England Inc.
d/b/a Verizon Rhode Island**

State of Rhode Island

Docket No. 3692

Respondent: Robert J. Kenney
Title: Executive Director - Regulatory

REQUEST: George Wiley Center Set 1

DATED: December 09, 2005

ITEM: GWC 1-1 Please state, by month if possible, the number of customers whose service was terminated due to non-payment in 2005.

REPLY: Objection: Verizon RI objects to this Data Request on the ground that it is untimely and on the ground that it seeks information that is neither relevant to the subject of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving its objection, Verizon Rhode Island (Verizon RI) responds as follows:

The requested information is proprietary and competitively sensitive in nature, and is being furnished only to the Commission and to the Division and the Attorney General in accordance with the terms of the Protective Agreements between Verizon and each of those parties. Verizon RI will also provide this response to the George Wiley Center upon execution of a Protective Agreement.

REPLY: (Cont'd)

Proprietary Response Begins

Proprietary Response Ends

VZ # 63

**Verizon New England Inc.
d/b/a Verizon Rhode Island**

State of Rhode Island

Docket No. 3692

Respondent: Robert J. Kenney
Title: Executive Director - Regulatory

REQUEST: George Wiley Center Set 1

DATED: December 09, 2005

ITEM: GWC 1-2 Please give the zip codes of these customers, if possible.

REPLY: Objection: Verizon RI objects to this Data Request on the ground that it is untimely and on the ground that it seeks information that is neither relevant to the subject of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving its objection, Verizon Rhode Island (Verizon RI) responds as follows: the requested information is not available and would require a special study.

**Verizon New England Inc.
d/b/a Verizon Rhode Island**

State of Rhode Island

Docket No. 3692

Respondent: Robert J. Kenney
Title: Executive Director - Regulatory

REQUEST: George Wiley Center Set 1

DATED: December 09, 2005

ITEM: GWC 1-3 Please state the average balance due of such terminated customers.

REPLY: Objection: Verizon RI objects to this Data Request on the ground that it is untimely and on the ground that it seeks information that is neither relevant to the subject of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving its objection, Verizon Rhode Island (Verizon RI) responds as follows:

The requested information is proprietary and competitively sensitive in nature, and is being furnished only to the Commission and to the Division and the Attorney General in accordance with the terms of the Protective Agreements between Verizon and each of those parties. Verizon RI will also provide this response to the George Wiley Center upon execution of a Protective Agreement.

REPLY: (Cont'd)

Proprietary Response Begins

Proprietary Response Ends

VZ # 65

**Verizon New England Inc.
d/b/a Verizon Rhode Island**

State of Rhode Island

Docket No. 3692

Respondent: Robert J. Kenney
Title: Executive Director - Regulatory

REQUEST: George Wiley Center Set 1

DATED: December 09, 2005

ITEM: GWC 1-4 Please state, by month if possible, the number of these customers who were reinstated as Lifeline customers.

REPLY: Objection: Verizon RI objects to this Data Request on the ground that it is untimely and on the ground that it seeks information that is neither relevant to the subject of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving its objection, Verizon Rhode Island (Verizon RI) responds as follows: the requested information is not available and would require a special study.

**Verizon New England Inc.
d/b/a Verizon Rhode Island**

State of Rhode Island

Docket No. 3692

Respondent: Robert J. Kenney
Title: Executive Director - Regulatory

REQUEST: George Wiley Center Set 1

DATED: December 09, 2005

ITEM: GWC 1-5 Please state, by month if possible, the number of these customers whose service was re-instated due to payment of outstanding bills.

REPLY: Objection: Verizon RI objects to this Data Request on the ground that it is untimely and on the ground that it seeks information that is neither relevant to the subject of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving its objection, Verizon Rhode Island (Verizon RI) responds as follows: the requested information is not available and would require a special study.

VZ # 67

**Verizon New England Inc.
d/b/a Verizon Rhode Island**

State of Rhode Island

Docket No. 3692

Respondent: Robert J. Kenney
Title: Executive Director - Regulatory

REQUEST: George Wiley Center Set 1

DATED: December 09, 2005

ITEM: GWC 1-6 Please state, by month if possible, the number of these customers who entered payment plans to cover unpaid arrearages.

REPLY: Objection: Verizon RI objects to this Data Request on the ground that it is untimely and on the ground that it seeks information that is neither relevant to the subject of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving its objection, Verizon Rhode Island (Verizon RI) responds as follows: the requested information is not available and would require a special study.

VZ # 68

**Verizon New England Inc.
d/b/a Verizon Rhode Island**

State of Rhode Island

Docket No. 3692

Respondent: Robert J. Kenney
Title: Executive Director - Regulatory

REQUEST: George Wiley Center Set 1

DATED: December 09, 2005

ITEM: GWC 1-7 Please state, by month if possible, the number of these plans that were broken.

REPLY: Objection: Verizon RI objects to this Data Request on the ground that it is untimely and on the ground that it seeks information that is neither relevant to the subject of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving its objection, Verizon Rhode Island (Verizon RI) responds as follows: the requested information is not available and would require a special study.

VZ # 69